

**IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GEORGE BONGIORNO, Administrator
of the Estate of BRIAN BONGIORNO,
Plaintiff

v.

SSB MASCHINENBAUM GMBH,
Defendant

Civil Action No. 05-198 (Erie)

PROPOSED DISCOVERY PLAN

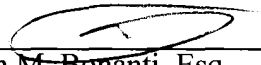
AND NOW, come the parties by and through undersigned counsel and present the following Proposed Discovery Plan, a statement of which follows;

- A. Plaintiffs have propounded first and second sets of interrogatories and requests for production of documents upon defendant.
- B. Defendant has agreed to propound an initial set of discovery requests to plaintiffs within ten days.
- C. Defendant agrees to designate a representative who is most knowledgeable with respect to the machinery more fully described in plaintiff's complaint and in compliance with FRCP 30 (b) (6) within a reasonable period of time.
- D. The parties would propose that discovery would close on March 31st, 2006.
- E. The parties agree that all dispositive motions will be filed no later than April 30th, 2006.
- F. Plaintiff's Pre-Trial Narrative would be due May 30th, 2006.
- G. Defendant's Pre-Trial Narrative would be due June 30th, 2006.

Respectfully submitted,

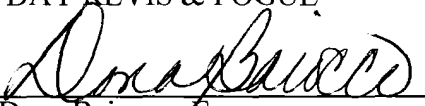
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JAMES J. STUCZYNSKI
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*ALSO ADMITTED IN OHIO

October 31, 2005

United States District Court
Clerk of Courts
Sixth and State Streets
Erie, PA 16501

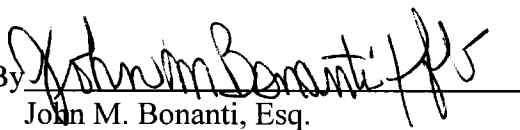
RE: Bongiorno v. SSB
No. 05-198 (Erie)

Dear Sirs:

Pursuant to the Court's Case Management Order enclosed you will find a proposed Discovery Plan for filing with the court. If you should have any questions, please feel free to call.

Very truly yours,

BERNARD STUCZYNSKI & BONANTI

By 
John M. Bonanti, Esq.

JMB:fmb
Enclosure
cc: Dana Baiocco, Esq.
cc: Mr. George Bongiorno